



Board of County Commissioners

Lincoln County, Nevada

P.O. Box 90 – Pioche, Nevada 89043

Telephone (775) 962-5390

Fax (775) 962-5180

COUNTY COMMISSIONERS

Paul Mathews, Chair
Bill Lloyd, Vice Chair

Ronda Hornbeck
George T. Rowe
Ed Higbee

DISTRICT ATTORNEY

Gregory J. Barlow

COUNTY CLERK

Lisa C. Lloyd

September 8, 2009

Solar Energy PEIS
Argonne National Laboratory
9700 S. Cass Avenue, EVS/900
Argonne, IL 60439

RE: Comments to Solar Energy Study Area Maps and Related Scope of Solar Energy PEIS

To Whom It May Concern:

Pursuant to the Bureau of Land Management's (BLM) offer and Lincoln County's agreement to participate as a Cooperating Agency in preparation of the Solar Programmatic EIS, I am writing to convey the County's comments on the Solar Energy Study Areas, and the scope of the Solar Energy PEIS. Lincoln County requests that the acreage of the Dry Lake Valley North Solar Energy Study Area be reduced significantly. Through review of maps on the BLM/DOE website for the Solar PEIS, Lincoln County has determined that the Dry Lake Valley North Solar Energy Study Area is many times larger than that approved on March 2, 2009, by the Board of Lincoln County Commissioners for recommendation to the BLM. Through consultation with grazing permittees and local BLM staff, the area identified by the County and recommended to the BLM sought to avoid and minimize direct impacts to public land grazing allotments and related indirect impacts to private-land base properties. The 49,775 acre area identified on the Argonne National Laboratory map entitled "Solar Energy Study Areas in Nevada" as Dry Lake Valley North is far in excess of the area identified by Lincoln County; and, if developed for solar energy, will result in unacceptable adverse impacts to the range livestock industry in Lincoln County.

Accordingly, Lincoln County requests that the total area of the Dry Lake Valley North Solar Energy Study Area, be redefined to including only the following areas (all contained within the Ely Springs Cattle grazing allotment):

T 1S, R64E, Sections 1, 2, 11,12, 13, and 14;
T 1S, R65E, Sections 6 (portions of), 7, 8 (portion of), 17 (portion of) and 18;
totaling approximately 5,760 acres.

It is imperative that the Dry Lake Valley North Solar Energy Study Area be confined to the Ely Springs Cattle grazing allotment, as this was the only allotment within the Dry Lake Valley area where existing private land is located and upon which the owner supports solar energy development. It is also crossed by existing approved electrical transmission corridors; and in which the owner of said private land and the Ely Springs Cattle grazing permit indicated to Lincoln County a desire that the above-described public lands be analyzed for solar energy development within the Solar PEIS.

Lincoln County further requests that the area identified for solar energy development within Delamar Valley be limited to 5,760 acres located immediately north and northwest of the Delamar Lake (dry). This request is also consistent with the March 2, 2009 recommendation of the Board of Lincoln County Commissioners, regarding the size and location of solar energy study areas in the County. Development of solar energy projects in this limited area and location will serve to greatly minimize impacts to public land grazing within Delamar Valley. Accordingly, Lincoln County requests that the total area of the Delamar Valley Solar Energy Study Area be redefined as including only the following areas (all contained within the Buckhorn grazing allotment):

T6S, R63E, E1/2 Section 33, Section 34
T7S, R63E, E1/2 Section 21, Sections 3, 4, 9, 10, 15, 16, 22;
totaling approximately 5,760 acres

Limitation of the Delamar Valley Solar Energy Study Area to the aforementioned area will serve to minimize impacts to public land grazing operations and related water improvements. This area is also adjacent to or crossed by existing and proposed electrical transmission lines and a Lincoln County maintained dirt road.

In addition, Lincoln County requests that the East Mormon Mountain solar energy study area be reduced from 7,148 acres to 3,780 acres, to avoid key grazing areas within the Gourd Spring Allotment. Specifically, through recent consultation with the grazing permittee, Lincoln County has determined that redefinition of the East Mormon Mountain solar energy study to the following areas will serve to minimize impacts to public land grazing within the Gourd Spring Allotment:

T11S, R69E, Section 13, E1/2 Section 24, Section 36
T11S, R70E, Section 18 (excepting that portion within the ACEC), Section 19, Section 20 (excepting that portion within the ACEC), Section 29 (excepting that portion within the ACEC), Section 30 (excepting that portion within the ACEC), Section 31 (excepting that portion within the ACEC); totaling approximately 3,780 acres.

In addition to minimizing impacts to public land grazing within the Gourd Springs Allotment, these lands enable immediate access to existing and proposed high-voltage electrical transmission lines; are accessible by an existing north-south dirt road; and

would minimize solar project related crossings of the Toquop Wash. They would also effectively link the existing Toquop Energy Project site (T11S, R69E, Section 36), which has been identified by BLM for disposal with areas recommended by Lincoln County for solar energy development.

On behalf of Lincoln County, Nevada, I would appreciate your immediate action in order to redefine the Dry Lake Valley North, Delamar Valley and East Mormon Mountain Solar Energy Study Areas as described above. I would further appreciate being advised at the earliest convenience of the BLM/DOE decision to redefine these areas as described above. The Lincoln County Commissioners have been contacted by various grazing interests in these areas expressing concern over the size of the currently defined Dry Lake Valley North, Delamar Valley, and East Mormon Mountain Solar Energy Study Areas. The Board of Lincoln County Commissioners wishes to immediately reassure permittees in these areas as to the limited extent of the Dry Lake Valley North, Delamar Valley and East Mormon Mountain Solar Energy Study Areas to be analyzed by BLM/DOE in the Solar PEIS as proposed above by the County.

With regard to the scope of the Solar PEIS, Lincoln County encourages a bounded analysis of generic solar project specific impacts and identification of related specific Best Management Practices and mitigation measures. Lincoln County believes such a level of generic project site specific analysis is required to enable timely post PEIS approval of land use authorizations filed by solar developers. In completing said generic project site specific analyses, Lincoln County further encourages BLM to consider the excellent comments to the Solar PEIS provided by the N-4 Grazing Board, particularly regarding early and continued involvement of impacted grazing permittees to identify and quantify impacts and to identify feasible measures to mitigate impacts. Further, Lincoln County requests that the Solar PEIS define the specific procedures by which "future projects should be permitted more quickly and at a lower cost". (Qs & As: BLM Solar Programmatic Environmental Impact Statement (PEIS), Page 6, Question 22). For example: would this expedited process involve conduct of NEPA Sufficiency Analyses in lieu of additional EA or EIS level analysis? Finally, Lincoln County requests continued input and involvement in developing specific future projects, regardless of which process is used, and whatever may come beyond the current PEIS development.

Your consideration of these important requests is greatly appreciated.

Sincerely,



Paul Mathews
Chairman